

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ECOPETROL S.A.,

Petitioner,

v.

OFFSHORE EXPLORATION AND
PRODUCTION, LLC,

Respondent.

Case No. 18 Civ. 10024 (PGG)

**STIPULATION AND [PROPOSED] ORDER
CONCERNING AMENDED PETITION**

WHEREAS, a stipulated order entered May 1, 2019 (ECF No. 18, the “2019 Order”), remanded certain Ambiguities for determination by the Tribunal. (Capitalized terms used and not defined in this status report have the meanings ascribed to them in the 2019 Order); and,

WHEREAS, in December 2021, the Tribunal rendered its “Interim Supplemental Award” which (among other things) determined the Ambiguities; and,

WHEREAS, in March 2022, the Tribunal rendered its “Final Supplemental Award” which (among other things) determined the amount due pursuant to the Tribunal’s determination of the Ambiguities; and,

WHEREAS, on June 9, 2022 Petitioner filed the Interim Supplemental Award and the Final Supplemental Award with this Court as exhibits to a status report (ECF No. 20); and,

WHEREAS, the filing of the Interim Supplemental Award and the Final Supplemental Award terminated the stay of proceedings in this case imposed by the 2019 Order; and,

WHEREAS, on June 14, 2022, petitioner Ecopetrol S.A. filed its “Amended Petition” seeking confirmation of the earlier Awards, of the Interim Supplemental Award and, in part,

of the Final Supplemental Award. The Amended Petition also seeks to vacate, in part, the Final Supplemental Award; and,

WHEREAS, the 2019 Order contemplates that the Court will set a reasonable schedule for further proceedings once it is notified that the Tribunal has determined the Ambiguities,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject (except as to paragraph 1 below) to the approval of the Court, as follows:

1. Respondent acknowledges adequate and timely service of the Amended Petition, and agrees that no further process is necessary or appropriate;

2. Respondent may have through August 17, 2022, to serve its response to the Amended Petition, with Petitioner afforded 30 days to reply; and,

3. Judge Gardephe's bundling rule (Individual Rule IV.C) is inapplicable to the Amended Petition because of the timing constraints imposed by the Federal Arbitration Act, but the parties should wait until the briefing is complete before submitting courtesy copies.

Dated: New York, New York
June 14, 2022

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SO ORDERED, at New York, N.Y.,
June ____, 2022:

Hon. PAUL G. GARDEPHE
United States District Judge